

TRAVIS E. SHETLER, ESQ.
 Nevada Bar No. 004747
travis@shetlerlawfirm.com
LAW OFFICE OF TRAVIS E. SHETLER, PC
 3202 W. Charleston Boulevard
 Las Vegas, Nevada 89102
 (702) 931-9700- Telephone
 (702) 931-9800- Facsimile
Attorney for Plaintiff Cecila Ann Dixon

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CECILA ANN DIXON, an individual;
 Plaintiff,

vs.

PACIFIC LIFE INSURANCE COMPANY,
 and DOES I through X inclusive.
 Defendants.

Case No. 2:21-cv-00172-APG-BNW

**REQUEST TO EXTEND DISCOVERY
 DEADLINES**

Plaintiff Cecilia Ann Dixon hereby requests that the Court grant not only the deadlines requested in Stipulated document 24, but also extend the Plaintiff's discovery deadlines. An additional sixty (60) days is requested. In addition to the information contained in Document 24, the following information is provided:

Specific description of the discovery that remains to be completed (LR 26-3(b)):

Discovery

- a. Deposition of Plaintiff's expert(s) if any
- b. Deposition of Pacific Life's nurse/agent
- c. Deposition of Pacific Life's Rule 30(b)(6) designee
- d. Disclosure of the Parties' experts and rebuttal experts, if any

...

...

...

Reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan (LR 26-3(c)):

At the time she retained the undersigned, the Plaintiff made it clear that she intended to participate in the litigation of this matter. She related that it would provide some consolation for the loss of her husband. The Plaintiff's mother has been critically ill and the Plaintiff has made many trips to Alaska to care for her mom. The Plaintiff will need more time to take depositions, gather documents and make a determination on whether to engage an expert. The Plaintiff believes that an additional sixty (60) days should be sufficient to allow completion of all discovery.

RESPECTFULLY SUBMITTED.

Dated this 28th day of February, 2022

/s/ Travis E. Shetler

By: _____
 Travis E. Shetler, Esq.
 Nevada Bar No. 004747
 3202 W. Charleston Blvd.
 Las Vegas, Nevada 89102
 Telephone: (702) 931-9700
 Facsimile: (702) 931-9800
travis@shetlerlawfirm.com
Attorney for Plaintiff
 CECILA ANN DIXON

ORDER

IT IS ORDERED that ECF No. 29 is DENIED without prejudice for failure to comply with the Local Rules regarding meet and confers.

IT IS SO ORDERED

DATED: 4:49 pm, March 02, 2022



BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Law Office of Travis E. Shetler, PC, and that on the 28th day of February, 2022, and pursuant to FCRP 5(b), a copy of the foregoing **MOTION TO EXTEND DISCOVERY DEADLINES** was served via the Court's CM/ECF system.

Karl O. Riley
Nevada Bar No. 12077
Laura M. Zulick (pro hac vice)
COZEN O'CONNOR, P.C.
3753 Howard Hughes Parkway Suite 200
Las Vegas, NV 89169
Telephone: (702) 470-2314
Facsimile: (702) 470-2351
koriley@cozen.com
lzulick@cozen.com
Attorney for Defendant
Pacific Life Insurance Company

/s/ Mary Chopski

An Employee of Law Office of Travis E. Shetler, PC